FCC For	m 481 - Carrier Annual Reporting Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	310785	
<015>	Study Area Name	Michigan Central Broadband Company,	LLC
<020>	Program Year	2018	
<030>	Contact Name: Person USAC should contact with questions about this data	Vicki Kakuk	
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9066395000 ext.1003	
<039>	Contact Email Address: Email of the person identified in data line <030>	vicki.kakuk@michbbs.com	
	Form Type	54.313 and 54.422	

FCC Form 481

	Data Collection Form								VIO VIDI	OMB Control No. 3060- July 2013	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	0. 3060-0819
<010>	Study Area Code	qe				310785						
	Study Area Name	ame				Michigan Ce	Michigan Central Broadband Company, LLC	ompany, LLC				
<020>	Program Year					2018						
<030>	Contact Name	Contact Name - Person USAC should contact regarding this data	should conta	ct regarding th	is data	Vicki Kakuk	×					
<035>	Contact Telep	Contact Telephone Number - Number of person identified in data line <030>	Number of po	erson identifie	1 in data line <	030> 9066395000 ext.1003	ext.1003					
<039>	Contact Email	Contact Email Address - Email Address of person identified in data line <030>	l Address of p	erson identifie	d in data line <		vicki.kakuk@michbbs.com					
<210> 6	or the prior	For the prior calendar year, were there any reportable voice service outages?	r, were ther	e any reporta	ble voice ser	vice outages?	No			1		
<220>	^e>	401>	<	<	<p4>&lt;</p4>	<c1></c1>	<<2>	>	<e></e>	\$	9	¢
	NORS Reference Number	Outage Start Outage Start Date Time	Outage Start Time	õ	8	Custom	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apoly)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventative Procedures
1												
_												
-												
-												
-												
_												
_												

Page 2

(300) Ur	(300) Unfulfilled Service Request	FCC Form 481
Data Co	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	<010> Study Area Code	310785
<015>	> Study Area Name	Michigan Central Broadband Company, LLC
<020>		2018
<030>	<ul> <li>Contact Name - Person USAC should contact regarding this data</li> </ul>	Vicki Kakuk
<032>		3 <b>0&gt;</b> 9066395000 ext.1003
<6E0>	<ul> <li>Contact Email Address - Email Address of person identified in data line &lt;030&gt;</li> </ul>	)30> vicki.kakuk@michbbs.com
<300>	<300> Unfulfilled service request (voice)	0
<310>	<310> Detail on attempts (voice)	
		Name of Attached Document
<320:	<320> Unfulfilled service request (broadband)	0
/330	2220s Dateil on attamote (broadhand)	
?		Name of Attached Document

Page 3

(400) Number of Com Data Collection Form	(400) Number of Complaints per 1,000 customers  OMB Control No. 3060-0986/OMB Control No. 3060-0986/OMB Control No. 3060-0819
<010>	Study Area Code
<015>	
<020>	Program Year
<030>	Contact Name - Person USAC should contact regarding this data
<035>	Contact Telephone Number - Number of person identified in data line
<039>	Contact Email Address - Email Address of person identified in data line vicki.kakuk@michbbs.com <030>
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior $toteoletaredout{timed} toteoletaredout{timed} toteoletar$
<410>	Complaints per 1000 customers for fixed voice $0.0$
<420>	Complaints per 1000 customers for mobile voice
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in Offered only fixed broadband the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.
<440>	Complaints per 1000 customers for fixed broadband $egin{array}{c} 0$ . $egin{array}{c} 0$
<450>	Complaints per 1000 customers for mobile broadband

(500) Cor	(500) Compliance With Service Quality Standards and Consumer Protection Rules	FCC Form 481	n 481
Data Col	Data Collection Form	OMB Conf July 2013	OMB Cantrol No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	<010> Study Area Code	310785	
<015>	<015> Study Area Name	Michigan Central Broadband Company, LLC	
<020>	<020> Program Year	2018	
<030>	<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk	
<035>	<035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003	
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> vicki.kakuk@michbbs.com	vicki.kakuk@michbbs.com	
<200>	<500> Certify compliance with applicable service quality standards and consumer protection rules	tection rules Yes	
r.		310785mi510.pdf	
<510>	<51.0> Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	es Compliance	
<\$15>	<515> Certify compliance with applicable minimum service standards		

PCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

(600) Functionality in Emergency Situations

Data Collection Form

010>	<010> Study Area Code	310785
:015>	<015> Study Area Name	Michigan Central Broadband Company, LLC
:020>	<020> Program Year	2018
:030>	<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
:035>	<035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	<039> Contact Email Address - Email Address of person identified in data line <030>	lata line <030> vicki.kakuk@michbbs.com
<009	<600> Certify compliance regarding ability to function in emergency situations	Yes
610>	<610> Descriptive document for Functionality in Emergency Situations	310785mi610.pdf

	Data Collection Form	Ę					OMB Con July 2013	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013	ontrol No. 3060-0819
<010>	Study Area Code	ı Code			310785				
<015>	Study Area Name	ı Name			Michigan C	Michigan Central Broadband Company, LLC	IC		
<020>	Program Year	ear			2018				
<030>		Contact Name - Person USAC should contact regarding this data	should contact	regarding this c	<b>jata</b> Vicki Kakuk				
<035>		Contact Telephone Number - Number of person identified in	Number of per	son identified in	data line <030>	9066395000 ext.1003			
<039>		Contact Email Address - Email Address of person identified in data line <030>	Address of pe	rson identified i	n data line <030>	vicki.kakuk@michbbs.com			
	Residential Lo Single State-w	Residential Local Service Charge Effective Date Single State-wide Residential Local Service Charge	ective Date Service Charge	1/1	1/1/2017				
<703>	<at></at>	<a2></a2>	<a3></a3>	<	<	<b>493</b>	 	<	0
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Service Rate	e Rate State Subscriber Line Charge See attached worksheet	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees

Page 7

0) Broadbrand Price Offerings	FCC Form 481
a Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

		July 2013
<010>	<010> Study Area Code	310785
<015>	<015> Study Area Name	Michigan Central Broadband Company, LLC
<020>	<020> Program Year	2018
<030>	<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<032>	<035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext,1003
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> vicki; kakuk@michbbs.com	vicki,kakuk@michbbs.com

A00	Usage Allowance Action Taken When Limit Reached {select }									
	Usage Allowance (GB)									
	Broadband Service - Upload Speed (Mbps)									
	Broadband Service - Download Speed (Mbps)									
	Total Rate and Fees			peq						
	State Regulated Fees			See attached	worksheet					
	Residential Rate									
	Exchange (ILEC)									
	State									

(900) Operation Companies		
(acc) Operating Companies Data Collection Form		FCC Form 481 OMB Control No. 3060-0986 (OMB Control No. 3060-0819
		July 2013
<010> Study Area Code 310785	S 8	
Study Area Name	n Central Broadband Company.	311
<030> Contact Name - Person USAC should contact regarding this data vick	Vicki Kakuk	
<035> Contact Telephone Number - Number of person identified in data line <030> 9066	9066395000 ext.1003	
<039> Contact Email Address - Email Address of person identified in data line <030> vich	vicki.kakuk@michbbs.com	
<810> Reporting Carrier Michigan Central Broadband Company		
<812> Operating Company Michigan Central Broadband Company		
V813.		(,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	7785	<b>/CP</b>
Affiliates	SAC	Doing Business As Company or Brand Designation
S	See attached worksheet	1
	- v'	

(900) Tribal Lands Reporting  Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	310785
<015> Study Area Name	Michigan Central Broadband Company, LLC
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
	9066395000 ext.1003
<039> Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com
<900> Does the filing entity offer tribal land services? (Y/N)	NO
<910> Tribal Land(s) on which ETC Serves	*
<920> Tribal Government Engagement Obligation	
	Name of Attached Document
If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:  <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.  <922> Feasibility and sustainability planning;  <923> Marketing services in a culturally sensitive manner;  <924> Compliance with Rights of way processes  <925> Compliance with Facilities Siting rules  <926> Compliance with Cultural Preservation review processes  <928> Compliance with Tribal Business and Licensing requirements.	Select Yes or No or Not Applicable

ata Colle	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	310785
1	Study Area Name	Michigan Central Broadband Company, LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035> (	Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki,kakuk®michbbs.com
<1000>	Voice services rate comparability certification $^{\mathbb{Y}\text{es}}$	σ
<1010>	310 Attach detailed description for voice services rate comparability compliance	310785mil010.pdf
		Name of Attached Document
<1020>	Yes  To adband comparability certification  The	s - Pricing is no more than the most recent applicable benchmark announced by e Wireline Competition Bureau
<1030>	Attach detailed description for broadband comparability compliance	310785mi1030.pdf
		Name of Attached Document

(2005) Pi	(2005) Price Cap Carrier Additional Documentation	FCC Form 481
Data Col	Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
Including	Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers	July 2013
<010>	<010> Study Area Code	310785
<015>	<015> Study Area Name	Michigan Central Broadband Company, LLC
<020>	.020> Program Year	2018
<030>	:030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	c035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	<039> Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate,

# Incremental Connect America Phase I reporting

<2011>	3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.		
<2022>	Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives		
	Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.		
<2023>	The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of		
	census blocks indicating where funding was spent. This covers year three - $54.313(b)(2)(ii)$ . Round 2 recipients only.		
<2024A>	Round 2 Recipient of Incremental Support?		
<2024B>	Attach list of census blocks indicating where funding was spent in year three - $54.313(b)(2)(ii)$ . Round 2 recipients only.	Name of Attached Document Listing Required Information	
<2025A>	Round 2 Recipient of Incremental Support?		
<2025B>	Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).	Name of Attached Document Listing Required Information	
<2015>	$2016$ and future Frozen Support Certification 47 CFR $\S$ $54.313(c)(4)$		

Page 14

(2005) Price Cap Carri Data Collection Form	(2005) Price Cap Carrier Additional Documentation Data Collection Form Including Rate-of-Return Carriers offiliated with Price Can Local Exchange Carriers	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
Price Cap <2016> Connect	Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}  (2016) Certification support used to build broadband  Connect America Phase II Reporting {47 CFR § 54.313(e)}	
<2017A>	<2017A> Connect America Fund Phase II recipient?	
<2017C>	<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.	
<2018>	Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)	Name of Attached Document Listing Required Information
<2019>	Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)	

(3005) Rate Of Return Carrier Additional Documentation Data Collection Form	FCC Form 481  OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	310785
<015>	Study Area Name	Michigan Central Broadband Company, LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	Contact Email Address - Email Address of person identified in data line <030> vicki.kakuk@michbbs.com	

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)				
		7	es - At	tach Certifica	tion
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}				310785mi3010.pdf
(3010B)	Please Provide Attachment	Name of Attached Doci Information	ıment Lis	ting Required	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(iI)}	No - No New Community	Anchors		
(3012B)	Please Provide Attachment	Name of Attached Docu Information	ıment Lis	ting Required	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f){2}}	(Yes/No)	0	<b>O</b>	
(3014)	If yes, does your company file the RUS annual report	(Yes/No)		O	
(3015)	Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:  Electronic copy of their annual RUS reports  (Operating Report for Telecommunications  Borrowers)				
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		L		
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Doct Information	ıment Lis	ting Required	
(3018)	If the response is no on line 3014, is your company audited? If the response is yes on line 3018, please check the	(Yes/No)	0	0	
(3019)	boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains: Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers				
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows				
(3021)	Management letter and/or audit opinion issued by the independent certifled public accountant that performed the company's financial audit. If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:				
(3022)	Copy of their financial statement which has been subject to review by an independent certifled public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers				
(3023)	Underlying information subjected to a review by an independent certified public accountant				
(3024)	Underlying information subjected to an officer certification.				
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows				
(3026)	Attach the worksheet listing required information	Name of Attached Docu Information	ıment Lis	ting Required	

(3005) Rate Of Return Carrier Additional Documentation (Continued) Data Collection Form	FCC Form 481 OM/B Control No. 3060-0986/OM/B Control No. 3060-0819 July 2013
<010> Study Area Code	310785
<015> Study Area Name	Michigan Central Broadband Company, LLC
<020> Program Year	2018
<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035> Contact Telephone Number - Number of person identified in data line <030>	906639500D ext.1003
c039s Contact Fmail Address - Small Address of parton identified in data line c030s	to a facility from the facility of the facilit

inancial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

Study Area Code	310785
Study Area Name	Michigan Central Broadband Company, LLC
Program Year	2018
Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
Contact Telephone Number - Number of person identified in data li	ne <030> 9066395000 ext 1003
Contact Email Address - Email Address of person identified in data I	ine <030> vicki_kakuk@michbbs_com
	Study Area Name Program Year Contact Name - Person USAC should contact regarding this data Contact Telephone Number - Number of person identified in data li

### 4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

### Public Interest Obligations - FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

**4001**. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

# Community Anchor Institutions - FCC 14-98 (paragraph 79)

**4003a**. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

### If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses
of community anchor institutions to which the
recipient newly began providing access to
broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

# Broadband Deployment Locations - FCC 14-98 (paragraph 80)

**4004a.** Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

**4004b.** Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

must at least detail the pricing, offered broadband Name of Attached Document Listing Required Information

Certification - Reporting Carrier	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	310785
<015>	Study Area Name	Michigan Central Broadband Company, LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

# TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

# Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients

certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.

Name of Reporting Carrier: Michigan Central Broadband Company, LLC

Signature of Authorized Officer: CERTIFIED ONLINE Date 06/28/2017

Printed name of Authorized Officer: Bruce Moore

Title or position of Authorized Officer: President and General Manager

Telephone number of Authorized Officer: 9066395000 ext.105

Study Area Code of Reporting Carrier: 310785 Filing Due Date for this form: 07/03/2017

Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503{b}, or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.

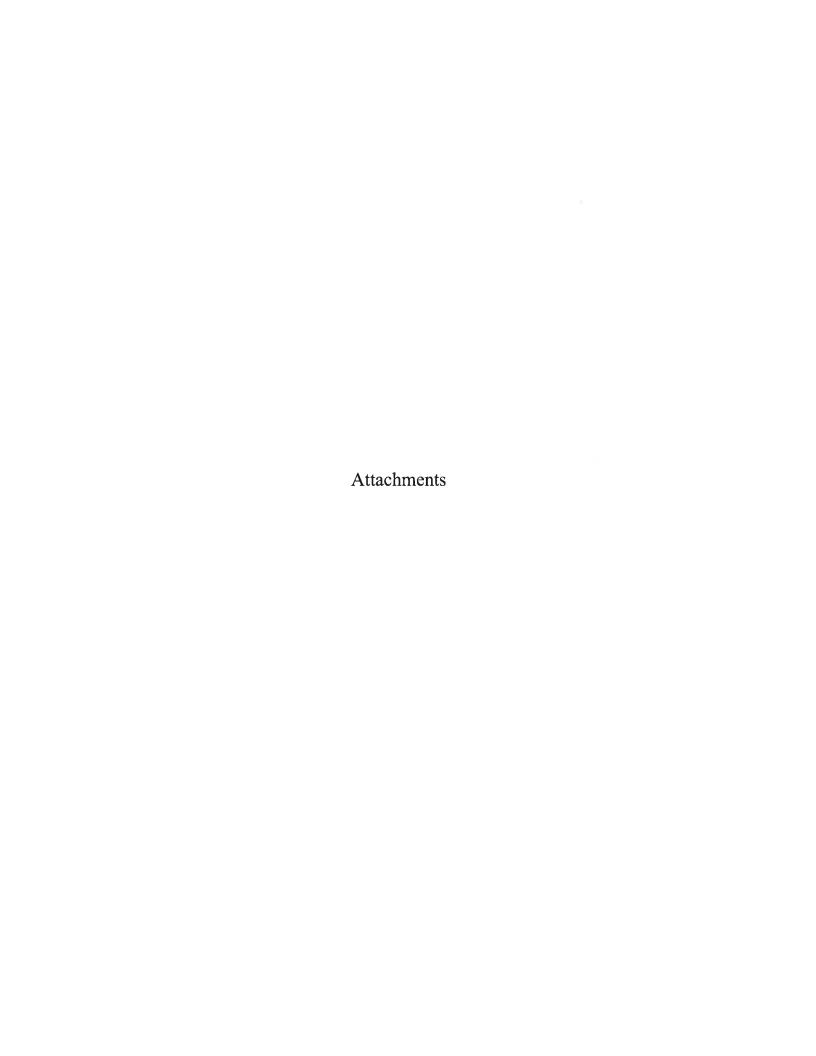
	tion - Agent / Carrier lection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	310785
<015>	Study Area Name	Michigan Central Broadband Company, LLC
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003
<039>	Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com

# TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

I certify that (Name of Agent) also certify that I am an officer of the reporting carrier;	my responsibilities include ensuring the accuracy of the	ir Li Recipients on Benair of Reporting Carrier  ubmit the information reported on behalf of the reporting carrier. I  annual data reporting requirements provided to the authorized
agent; and, to the best of my knowledge, the reports a	nd data provided to the authorized agent is accurate.	
Name of Authorized Agent:		
Name of Reporting Carrier:		
Signature of Authorized Officer:		Date:
Printed name of Authorized Officer:		
Title or position of Authorized Officer:		
Telephone number of Authorized Officer:		
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	
Persons willfully making false statements on this form	can be punished by fine or forfeiture under the Communications A under Title 18 of the United States Code, 18 U.S.C. § 1001,	Act of 1934, 47 U,S.C. §§ 502, 503(b), or fine or imprisonment

# TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent	: Authorized to File Annual Reports for CAF or LI R	ecipients on Behalf of Reporting Carrier
	horized to submit the annual reports for universal service s reporting carrier; and, to the best of my knowledge, the in	support recipients on behalf of the reporting carrier; I have provided formation reported herein is accurate.
Name of Reporting Carrier:		
Name of Authorized Agent Firm:		
Signature of Authorized Agent or Employee of Agent:		Date:
Name of Authorized Agent Employee:		
Title or position of Authorized Agent or Employee of Ager	nt	
Telephone number of Authorized Agent or Employee of A	gent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:	
Persons willfully making false statements on this for	m can be punished by fine or forfeiture under the Communication. 18 of the United States Code, 18 U.S.C. § 100	s Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title



File name: 310785mi510

# Michigan Central Broadband Company

# **Compliance with Service Quality Standards and Consumer Protection**

As required in 47 C.F.R. § 54.313(a)(5) for High-cost Recipients, the following is a detailed description of how the Company complies with Service Quality Standards and Consumer Protection Rules.

**SERVICE QUALITY STANDARDS:** The Company abides by the general industry standards for service quality. The Company takes quality of service very seriously and is continually training the employees in order to make certain that the highest level of service is provided to the customers.

# **CONSUMER PROTECTION RULES:**

The Company developed and implemented a Customer Proprietary Network Information ("CPNI") Compliance Manual and has appointed a CPNI Compliance Officer. Annually, the Company requires all employees to certify that they have reviewed and understand the CPNI Compliance Manual and that they understand that any violation of the Company's CPNI procedures may result in disciplinary action up to and including dismissal. The Company files an annual report with the Federal Communications Commission ("FCC") certifying compliance with the FCC's CPNI rules.

The Company also developed and implemented an Identity Theft Prevention Program Manual and has appointed a Red Flag Coordinator. Annually, the Company requires all employees certify that they have reviewed and understand the Identity Theft Prevention Program Manual. Further, employees must certify that they understand that any violation of the Company's identity theft prevention procedures may result in disciplinary action up to and including dismissal.

# Michigan Central Broadband Company Compliance with Service Quality Standards and Consumer Protection

THE STATE OF MICHIGAN HAS NO QUALITY OF SERVICE RULES IN PLACE AT THIS TIME.

File name: 310785mi610

# Michigan Central Broadband Company Line 610 – Functionality in Emergency Situations

As required in 47 C.F.R. § 54.313(a)(6) for all high cost recipients, which includes the Company, and as set forth in 47 C.F.R. § 54.202(a)(2), the following provides a detailed description demonstrating that the Company has the ability to remain functional in emergency situations, including a demonstration that 1) it has eight (8) hours of back-up power to ensure functionality without an external power source, 2) is able to reroute traffic around damaged facilities, and 3) is capable of managing traffic spikes resulting from emergency situations.

**OVERALL RESPONSE TO EMERGENCY SITUATIONS:** The Company has a comprehensive disaster recovery plan (also called a "continuity plan") that was developed and implemented for the Company specifically to deal with emergencies. It has detailed, specific steps that are to be taken for each type of emergency.

**POWER:** In order to function in an emergency, the Company has a combination of batteries and emergency generators. Some locations have permanent emergency generators with fuel tanks; whereas, other locations require a portable generator to be brought to the location to recharge the on-site batteries. The company owns several portable generators that technicians can take out to recharge the batteries. For example, the company's central offices have automatic stand-by generators to run the entire offices. The digital loop carrier ("DLC") sites also have battery back-up.

**REROUTING TRAFFIC AND REDUNDANCY:** The Company has established 100% redundant E-911 trunks and SS-7 routes. In addition, the network was designed with redundancy, wherever possible, especially in the backbone network. Where it is not redundant, the Company has the ability to redirect most backbone traffic. In cases where there is no redundancy, it is due to the extreme cost of a 100% redundant network. For example, the loop to the customer location is typically not redundant, especially for residential customers. This is because it would not be cost effective to build totally separate facilities for the "last mile" to the customer.

**MANAGING TRAFFIC SPIKES:** The Company realizes that when a catastrophe happens, everyone immediately tries to contact friends and family to make certain they are all right. The Company has designed the network to have excess capacity on its backbone network. For example, on Mother's Day, the company handles traffic without the customer receiving the "All Trunks Busy" message which demonstrates the Company's ability to handle peak traffic spikes.

(700) Price Offerings including Voice Rate Data	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	<010> Study Area Code	310785
<015>	<015> Study Area Name	Michigan Central Broadband Company, LLC
<020>	<020> Program Year	2018
<030>	<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk
<035>	<035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext;1003
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> vicki,kakuk@michbbs.com	vicki,kakuk@michbbs.com
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<705>	<702> Single State-wide Residential Local Service Charge	

	9.6
Residential Local Service Unarge Effective Date	Single State-wide Residential Local Service Charge
<10/>	<702>

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<	 	<	 	<	<c></c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fees
MI	Amble		7. K	25.5	0.0	0.0	0.0	25.5
MI	Chester		মুম	25,5	0.0	0.0	0.0	25,5
MI	Grace Harbor		FR	25.5	0.0	0.0	0.0	25.5
MI	Manistee River		FR	26.45	0.0	0.0	0.0	26.45

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Usage Allowance (GB)	0.66666	00'666666	00'666666	00'666666	00'666666	00'666666	00:666666	0076666666	00'666666																																																					
Broadband Service - Upload Sneed (Mbns)	1.00	1.0	100	1.00	1.0	1.00	100	5	2.0																																																					
Broadband Service - Download Speed (Mbos)	1,00	4.00	4,00	6.00	90'9	9009	10,00	00'01	10.00																																																					
Total Rate and Fees No Data Entry Required Calculated by System																						The second secon																																								
State Resultsted Fees	000	000	0000	000	0.00	000	000	000	000																																																					
Recidential Rate	39.95	44.95	44.95	\$1.95	51.95	51.95	63.95	65.60	63.95																																																					
	Manistee River																																																													
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FCC Form 481	OMB Control No. 3060-0986/OMB Control No. 3060-0819	July 2013
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(800) Operating Companie	Data Collection Form	

<010>	<010> Study Area Code	310785	
<015>	<015> Study Area Name	Michigan Central Broadband Company, LLC	מץ, וווכ
<020>	. Program Year	2018	
<030>	<030> Contact Name - Person USAC should contact regarding this data	Vicki Kakuk	
<035>	<035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext,1003	
<039>	<039> Contact Email Address - Email Address of person identified in data line <030> vicki, kakuk@michbbs.com	vicki kakuk@michbbs.com	
<810>	<810> Reporting Carrier Michigan Central Broadband Company		
<811>	. Holding Company LICT Corporation		
<812>	<812> Operating Company Michigan Central Broadband Company		
		150	300
<813>	<a1></a1>	<92>	<a3></a3>
	Affiliates	SAC	Doing Business As Company or Brand Designation
	Bretton Woods Telephone Company, Inc.	120038	Bretton Woods, World Surfer
	Upper Peninsula Telephone Company	310732	Michigan Broadband Services, UPTC, MCBC, Alphacomm.ne
	Michigan Central Broadband Company	310785	Michigan Broadband Services, MCBC, Alphacomm.net

jet.

LIC

Cuba City, LaGrant Connections,

Belmont, LaGrant Connections,

Central Scott, Dixon Telephone Company Haviland, Giant Communications, Inc.

CST Communications, iWireless

Central Scott

351125

359032 351150 411780

330872

Cuba City Telephone Exchange Company

Belmont Telephone Company

Central Scott Telephone Company

CST Communications, Inc. Dixon Acquisition LLC

330847

J.B.N., Giant Communications, Inc.

411785

Inc

Inc

Western New Mexico Telephone Co.,

Inc.

Central Utah Tel Skyline Telecom Bear Lake Comm

Haviland Telephone Company, J. B. N. Telephone Company, WNM Communications

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Centracom, CentraCom Interactive

InterCommunity

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INTERCOMMUNITY TELEPHONE COMPANY

WNM Communications Corporation

LaGrant Connections, LLC

Central Telcom Services, LLC

Valley Communications, Inc.

Inc

Cal-Ore Telephone Company Giant Communications, Inc. Alpha Enterprises Limited,

World Surfer, Inc.

Valley

Alphacomm.net World Surfer

Cal-Ore

542311

Giant

LaGrant Connections, LLC WNM Communications

481	OMB Control No. 3060-0986/OMB Control No. 3060-0819	
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(800) Operating Compani	Data Collection Form	The Section of the Se

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<015> Study Area Name	Michigan Central Broadband Company,	any, LLC
<020> Program Year	2018	
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<035> Contact Telephone Number - Number of person identified in data line <030>	9066395000 ext.1003	
<039> Contact Email Address - Email Address of person identified in data line <030>	vicki.kakuk@michbbs.com	
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<812> Operating Company Michigan Central Broadband Company		
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Affiliates	SAC	Doing Business As Company or Brand Designation
Cal-Ore Communications, Inc.		Cal-Ore Communications
CS Technologies, Inc.		CS Technologies

**File name:** 310785mi1010.pdf

# Michigan Central Broadband Company Line 1010 – Voice Services Rate Comparability

As required in 47 C.F.R. § 54.313(a)(10), any recipient of high-cost support shall provide a letter certifying that the pricing of the company's voice services is no more than two standard deviations above the applicable national average urban rate for voice services, as specified in the most recent public notice issued by the Wireline Competition Bureau and Wireless Telecommunications Bureau.

The following provides the Company's support for Line 1010 -Description of Voice Service Rate Comparability.

As of January 1, 2017, the Company charges the following fixed voice prices:

Flat Rate Residential Service	\$25.50	\$26.45
State Residential Subscriber Line Charge	0.00	0.00
State Universal Service Charge Fee	0.00	0.00
Mandatory Extended Area Service	0.00	0.00
Residential Federal Subscriber Line Charge	<u>6.50</u>	<u>6.50</u>
Total Residential Fixed Voice Charges	\$32.00	\$32.95

Since the total for residential fixed voice that the Company charges, as shown above, is above the 2016 rate floor for voice services of \$22.49 and below the reasonable comparability benchmark for voice services of \$49.51, announced by the FCC Wireline Competition Bureau in the Public Notice released on February 14, 2017 (DA 17-167), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(10).

File name: 310785mi1030.pdf

# Michigan Central Broadband Company Line 1030 – Broadband Comparability

In a December 2014 Order (FCC 14-90), paragraphs 119-123, the FCC created Section 54.313(a)(12) which requires recipients of High Cost Program and/or Connect America Fund support that are subject to broadband performance obligations to submit a broadband reasonable comparability rate certification.

The following provides the Company's support for Line 1020 - Description of Broadband Service Rate Comparability.

As of January 1, 2017, the Company charges the following residential broadband prices:

Download Speed	10Mbps	6Mbps	4Mbps
Upload Speed	1Mbps	1Mbps	1Mbps
Usage Allowance	Unlimited	Unlimited	Unlimited
TOTAL RESIDENTIAL	\$63.95	\$51.95	\$44.95

Since the total for residential broadband that the Company charges for 10 Mbps x 1 Mbps service, as shown above, is below the \$77.98 for 10 Mbps x 1 Mbps service with the unlimited usage allowance, which is the reasonable comparability benchmark for broadband service announced by the FCC Wireline Competition Bureau in the Public Notice released on February 14, 2017 (DA 17-167), the Company hereby certifies that it is in compliance with 47 C.F.R. § 54.313(a)(12).

Filename: 310785mi1210

# LIFELINE SERVICE TERMS AND CONDITIONS

# A. DESCRIPTION

- 1. Lifeline Service applies discounts to monthly recurring rates for qualifying residential customers. These discounts are applied to existing tariffed rates and charges for residential telephone service. The Company's voice Lifeline plan includes unlimited local minutes-of-use within the toll-free calling area. Residential customers are allowed 2,000 minutes of calling into their expanded local calling areas (adjacent exchanges) free of charge each month. Each minute after that is charged at \$0.05 per minute.
- 2. In order to be eligible for Lifeline Service a residential customer's household income must be at or below 150% of the poverty level as determined by the U.S. Department of Health and Human Services and as approved by the State Treasurer, or the customer must participate in one of the following federal assistance programs:
  - a. Medicaid
  - b. Supplemental Nutrition Assistance Program (SNAP) Food stamps
  - c. Supplemental security income (SSI)
  - d. Federal public housing assistance/Section 8
  - e. Low-income home energy assistance program (LIHEAP)
  - f. National school lunch program's free lunch program
  - g. Temporary assistance for needy families (TANF) aka Family Independence Program
  - h. Veteran's Pension Program
  - i. Veteran's Survivor's Pension Program
- 3. Other services can be provided with the Lifeline Service at applicable rates and charges.
- 4. Proof of eligibility will be required for all initial applicants and all Lifeline recipients will be required to re-certify every year.

# **B. REGULATIONS**

- 1. Regulations specified elsewhere in the Company's tariffs apply to Lifeline Service.
- 2. Lifeline Service is only available with residence services, excluding foreign exchange service. Lifeline Service is limited to one line per household at the customer's primary residence.
- 3. A miscellaneous service charge does not apply when Lifeline Service is added or discontinued to existing service when that is the only work being done.
- 4. a. The discount on the monthly rate for qualified Lifeline customers shall be \$9.25. Credits are applied to the end user's basic local exchange service. At no time shall the total Lifeline credit exceed the sum of the end user common line charge and the basic local exchange rate. The discount on the monthly rate for qualified Lifeline customers 65 years of age or more shall be \$12.35. At no time shall the total Lifeline credit exceed the sum of the end user common line charge and the basic local exchange rate. Qualified participants on tribal lands will receive, in addition to the discounts listed above, an additional federal approved reduction of up to \$25.00 applied to the monthly local service rate.
  - b. The Company will provide, at the qualifying customer's option, toll blocking service at no charge. Toll blocking is defined as a central office service that restricts access to the network. Toll blocking is provided where facilities permit and will not allow 1+, 0+, 0-, 101XXXX, 900, or interzone calls to be completed. Toll blocking does not restrict local calls, calls to intraNPA directory assistance, telephone repair service, 911, or calls to 800 or 950 numbers.
  - c. The Company will not require a service deposit to initiate Lifeline Service if the qualifying customer voluntarily elects toll blocking service.

- d. The Company will provide, at the qualifying customer's option, long distance (toll) service at the rate of \$0.12 per minute. In addition to this basic long distance calling rate, the Company also offers the following long distance call plans: 200 minutes of long distance calling at the rate of \$19.00 per month, 400 minutes of long distance calling at the rate of \$34.00 per month, or 600 minutes of long distance calling at the rate of \$45.00 per month.
- e. Participants in Lifeline shall not be disconnected from local service for non-payment of toll charges. In addition, the Company will not deny reestablishment of local service to customers who are eligible for Lifeline and have previously been disconnected for non-payment of toll charges.
- 5. The Lifeline plan will apply after receipt and processing of a completed company or community/government-provided application, including documentation indicating that the household income meets the eligibility standards established above.
- 6. Customers of Lifeline Service must notify the Company of any changes which would affect qualification. Recertification of eligibility will take place on an ongoing basis. When the customer is no longer eligible for Lifeline Service, the Lifeline discount would be discontinued and regular tariff rates and charges would apply.

# C. TRIBAL LINK UP PROGRAM

- 1. A discount on the line connection charge specified elsewhere in this tariff is also available to qualifying customers for the installation or transfer of service from one residential premises to another.
  - a. A qualifying customer may receive a 100% reduction in the installation charges, or transfer of service charges for connection at the customer's principal place of residence.
  - b. A qualifying customer may then make payments for the connection charges on a deferred schedule in which the qualifying customer does not pay interest. The interest charges not charged to the qualifying customer shall be for connections charges of up to \$200.00 that are deferred for a period not to exceed one year. Charges assessed for installation or transfer of service include any charges that the Company customarily assesses to connect subscribers to the network. These charges do not include any permissible security deposit requirements.
  - c. A qualifying customer can receive the benefits of the Tribal Link Up Program for a second and subsequent time only for a principal place of residence with an address different from the residence address at which the Link Up assistance was provided previously.

# D. ELIGIBLE RESIDENTS OF TRIBAL LANDS

Applicants residing on Tribal lands referenced in Title 25 Code of Federal Regulations, Section 20.1, paragraph (v) may qualify for Lifeline service in accordance with the qualification criteria contained on Sheet 25, or if they participate in one of the following federal programs:

- a. Bureau of Indian Affairs general assistance
- b. Tribally administered Temporary Assistance for Needy Families
- c. Head Start (must meet income qualifying standard of program
- d. Food Distribution Program on Indian Reservations

An applicant residing on Tribal lands must certify under penalty of perjury that he/she resides on a reservation as defined in Title 25 Code of Federal Regulations, Section 20.1, paragraph (v) and meets at least one of the qualification criteria. The Tribal lands applicant also must agree to notify the Company if he or she ceases to qualify as an eligible resident of Tribal lands.

File name: 310785mi3010.pdf

# Michigan Central Broadband Company Line 3010 – Certification of Public Interest Obligations

As required in 47 C.F.R. § 54.313(f)(1)(i), any rate-of-return ETC receiving support must certify it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time.

With this document, the Company hereby certifies that it has taken reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, and that requests for such service were met within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

In locations where 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, cannot be provided currently, a reasonable request financial analysis is performed based on the requirements included in the FCC Orders related to reasonable requests including those shown on the following pages.

If the request meets the qualifications of the reasonable request analysis, broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas, is provided within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

If the request does not meet the qualifications of the reasonable request analysis, broadband service is analyzed at actual speeds of at least 4 Mbps downstream/1 Mbps upstream and if that analysis meets the qualifications of the reasonable request analysis, broadband service is provided at actual speeds of at least 4 Mbps downstream/1 Mbps upstream as required by the FCC rules and regulations within a reasonable amount of time as required by 47 C.F.R. § 54.313(f)(1)(i).

If the reasonable request analysis does not meet the qualifications for either the 10 Mbps or the 4 Mbps reasonable request analysis, the customer is informed that broadband service cannot be provided at this time at either of those speed levels and provided information on what speed level would be available at their location. The reasonable request analysis is retained and recomputed if significant conditions change, as required by the FCC rules and regulations.

**CERTIFICATION:** The Company certifies that it is in compliance with the FCC Rules and Regulations and all appropriate documents are being filed as required by 47 C.F.R. § 54.313(f)(1)(i). The certification by an officer of the Company is included as part of the overall certification for the Form 481, which includes all attachments and is made by an officer of the Company whose responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients. The overall Form 481 certification is made that to the best of the officer's knowledge, the information reported on the Form 481, including attachments, is accurate.

# Primary FCC Orders Relating to "Reasonable Requests" for Broadband Service

In its 2011 *USF/ICC Transformation Order*<sup>1</sup> the Commission required rate-of-return carriers receiving Universal Service Fund (USF) support to provide their customers with "at least the same initial minimum level of broadband service as those carriers who receive model-based support ...." <sup>2</sup> Recognizing RLECs' generally small size, however, the Commission determined these carriers "should be provided greater flexibility in edging out their broadband-capable networks in response to consumer demand." More specifically, the Commission stated that, "[u]pon receipt of a reasonable request for service, carriers must deploy broadband to the requesting customer within a reasonable amount of time."<sup>3</sup>

In its 2012 *Third Order on Reconsideration,*<sup>4</sup> the Commission clarified that its rules "provide sufficient flexibility to take into account any unique circumstances that may impact the ability of rate-of-return companies to extend broadband to their customers, including backhaul costs."<sup>5</sup>

Later, in its 2014 Seventh Order on Reconsideration, the Commission acknowledged that there remained "some ambiguity" as to what would constitute an unreasonable request for service.<sup>6</sup> It accordingly included a Declaratory Ruling to clarify matters.<sup>7</sup>

The *Declaratory Ruling* first suggests that rate-of-return carriers evaluating a request to extend broadband service should consider:

<sup>&</sup>lt;sup>1</sup> See Connect America Fund; A National Broadband Plan for Our Future; Establishing Just and Reasonable Rates for Local Exchange Carriers; High-Cost Universal Service Support; Developing a Unified Intercarrier Compensation Regime; Federal-State Joint Board on Universal Service; Lifeline and Link-Up; Universal Service Reform – Mobility Fund; WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 17663 (2011) (USF/ICC Transformation Order).

<sup>&</sup>lt;sup>2</sup> Id. ¶ 206.

<sup>&</sup>lt;sup>3</sup> *Id.* ¶ 208.

<sup>&</sup>lt;sup>4</sup> See Connect America Fund et al., WC Docket No. 10-90, et. al., Third Order on Reconsideration, 27 FCC Rcd. 5622 (2012) (*Third Order on Reconsideration*).

<sup>&</sup>lt;sup>5</sup> *Id.* ¶ 46.

<sup>&</sup>lt;sup>6</sup> Connect America Fund, WC Docket No. 10-90, Universal Service Reform – Mobility Fund, WT Docket No. 10-208, ETC Annual Reports and Certifications, WC Docket No. 14-58, Establishing Just and Reasonable Rates for Local Exchange Carriers, WC Docket No. 07-135, Developing an Unified Intercarrier Compensation Regime, CC Docket No. 01-92, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 29 FCC Rcd. 1175 (2014) ¶ 64 (Seventh Order on Reconsideration).

<sup>&</sup>lt;sup>7</sup> *Id.* ¶ 59.

whether it would be reasonable to make the necessary upgrades in light of anticipated end-user revenues from the retail provision of broadband service and other sources of revenues, including but not limited to federal or state universal service funding projected to be available under current rules. In considering end-user revenues, carriers should take into account the reasonable comparability benchmark for broadband services. If the incremental cost of undertaking the necessary upgrades to a particular location exceed the revenues that could be expected from that upgraded line, a request would not be reasonable.<sup>8</sup>

The Declaratory Ruling then specifically relates determination of unreasonable requests to the \$250/line cap on total high cost support imposed by the 2011 USF/ICC Transformation Order:

[A] request is not reasonable if it would require a carrier to undertake new network upgrades to install new backhaul facilities or to replace existing copper lines to the home with fiber merely for the purpose of newly providing broadband service in study areas where total support already is subject to the \$250 per line monthly cap. Moreover, we declare that a request is not reasonable if it would require a carrier to undertake new network upgrades to newly provide broadband service to requesting customers if that would cause total monthly support that presently is under the \$250 cap to exceed the cap ....<sup>9</sup>

The Commission also made clear a rate-of-return carrier has no obligation to extend broadband-capable infrastructure in any census block that is served by an unsubsidized competitor that meets the Commission's current performance standards.<sup>10</sup>

At the time the *Declaratory Ruling* was issued, the Commission was also considering whether to revise its broadband performance obligations to require higher speeds, such as 10Mbps downstream.<sup>11</sup> The Commission reiterated, however, that if minimum speed requirements were increased, a rate-of-return carrier would only be required to provide the higher speed service if the request was reasonable:

In determining whether a particular upgrade is cost effective, the carrier should consider not only its anticipated end-user revenues from the services to be offered over that network, both voice and retail broadband internet access, but also other sources of support, such as federal and, where available, state universal service funding. Under our proposal to increase the minimum downstream speed threshold, we thus would not expect a rate-of-return carrier immediately to upgrade its entire existing infrastructure

<sup>8</sup> *Id.* ¶ 65.

<sup>&</sup>lt;sup>9</sup> *Id.* ¶ 67.

<sup>&</sup>lt;sup>10</sup> *Id*. ¶ 68.

<sup>&</sup>lt;sup>11</sup> *Id.* ¶ 138.

to provide 10 Mbps downstream and 1 Mbps upstream (10 Mbps/1 Mbps) to all current customers. Rather, we propose that rate-of-return carriers would take into account any revised speed standards when considering whether and where to upgrade existing plant in the ordinary course of business and would report on progress toward this goal in preparing annual updates to their five-year service improvement plans.<sup>12</sup>

In a *Report and Order* released December 18, 2014 the Commission adopted several measures to address non-compliance with its CAF deployment obligations.<sup>13</sup> Noting that rate-of-return carriers were required to build out their networks only on "reasonable request," the Commission determined that non-compliance issues for RLECs should be dealt with on a case-by-case basis.<sup>14</sup> (This differs significantly from the strict milestone-based measures applicable to other eligible telecommunications carriers (ETCs).)

The Commission further clarified that rate-of-return carriers "should report any requests that are deemed unreasonable as unfulfilled requests in their section 54.313 annual reports." USAC is expected to verify that rate-of-return carriers have sufficient evidence to demonstrate that any unfulfilled requests were in fact unreasonable. <sup>16</sup> To the extent USAC determines that insufficient evidence to support a denial of service, such finds shall be reported as "other matters." <sup>17</sup>

<sup>&</sup>lt;sup>12</sup> *Id.* ¶ 144.

<sup>&</sup>lt;sup>13</sup> Connect America Fund, WC Docket No. 10-90, ETC Annual Reports and Certifications, WC Docket No. 14-58, Petition of USTelecom for Forbearance Pursuant to 47 U.S.C. § 160(c) from Obsolete ILEC, Regulatory Obligations that Inhibit Deployment of Next-Generation Networks, WC Docket No. 14-192, Report and Order, FCC 14-190 (rel. Dec. 18, 2014) (Report and Order).

<sup>&</sup>lt;sup>14</sup> *Id*. ¶ 143.

<sup>&</sup>lt;sup>15</sup> Id. ¶ 153.

<sup>&</sup>lt;sup>16</sup> *Id*.

<sup>&</sup>lt;sup>17</sup> Id.